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VIA ECF

June 21, 2016

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *United States v. Jason Galanis et al.*, 16-CR-371 (RA)

Dear Judge Abrams:

We write on behalf of our client, Mr. Bevan Cooney, to request that the Court extend the current deadline for execution of Mr. Cooney's personal recognizance bond.

The personal recognizance bond securing Mr. Cooney's pre-trial release in the above-captioned matter (the "Bond") is required to be co-signed by one financially responsible person on or before June 22, 2016. Mrs. Kathleen Cooney (Mr. Cooney's mother) has agreed to co-sign the Bond, but the government has requested financial documents in order to approve the proposed surety. As such, Mrs. Cooney is in need of additional time to gather the documents requested by the government. Additionally, Mrs. Cooney has difficulty seeing and needs to arrange for someone to drive her to her nearest federal courthouse in order to sign the Bond, as required. Accordingly, we respectfully request that the Court extend the deadline by which the Bond must be fully executed to July 6, 2016. We do not anticipate that any further extensions will be needed.

We have conferred with AUSA Brian Blais, who has informed us that the government does not oppose the requested extension. Thank you for your consideration.

Respectfully submitted,



Matthew D. Umhofer

cc: All counsel (via ECF)

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